



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**ZACHARY W. CARTER**  
*Corporation Counsel*

**ALLYSON BROWN**  
phone: (212) 356-3521  
fax: (212) 356-3509  
albrown@law.nyc.gov

April 23, 2018

**BY ECF**

Honorable Vernon S. Broderick  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Scott Hill v. City of New York, et al.  
17 CV 1420 (VSB)

Your Honor:

I am the Assistant Corporation Counsel in the Special Federal Litigation Division of the Office of the Corporation Counsel assigned to this matter. This Office writes concerning the Court's Order dated April 12, 2018.

As the Court is aware, for months this Office has been communicating with the Court and Plaintiff concerning this Office's efforts to identify the John Doe defendants in compliance with the Court's Valentin Order. Consequently, by letter dated April 10, 2018, this Office requested permission to serve Plaintiff with identification interrogatories to assist us in identifying these individuals. (ECF Docket Entry No. 17.) On April 12, 2018, the Court granted that request and directed this Office to serve Plaintiff with questions by April 25, 2018, the responses to which would be due by May 9, 2018. (ECF Docket Entry No. 18.)

On April 13, 2018, this Office received a letter from Plaintiff dated April 11, 2018, which provides more detailed descriptions of the individuals alleged to be involved in the incident(s), as well as the corresponding date(s) of incident(s). While the letter goes beyond the scope of the Complaint concerning the conduct being alleged, we hope that the descriptions therein will assist us in identifying the appropriate defendants. For the convenience of the Court, we have attached hereto a copy of Plaintiff's April 11th Letter, as Exhibit A.<sup>1</sup> We intend to contact Plaintiff to clarify some details in his letter before proceeding with our investigation. We believe the information in the April 11th Letter may eliminate the need to serve identification interrogatories.

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<sup>1</sup> We have already shared this letter with the New York State Office of the Attorney General.

Thank you for your consideration herein.

Respectfully submitted,



Allyson Brown  
Assistant Corporation Counsel  
Special Federal Litigation Division

cc: Scott Hill (*via first class mail*)  
*Plaintiff pro se*  
298 Nome Avenue  
1st Floor  
Staten Island, New York 10314

# EXHIBIT A

2018-062119  
SF- A Brown

April 11, 2018

Allyson Brown  
The City of New York Law Department  
100 Church Street  
New York, NY 10007

**Re: Hill v. The People of the State of New York; 1:17-cv-01420-VSB**  
**Description of Defendants**

Dear Ms. Brown:

I am writing in response to your April 10, 2018 letter. Below please find the requested information:

Date: January 14, 2016

Location: 100 Centre Street, New York, NY 10013, in between holding pens and the courtroom

Time: Approximately 3:00pm

Individuals:

1. **John Doe Corrections Officer #1:** Male corrections officer who was over six feet tall, was built, had short hair, and had tan skin. May have been Hispanic or Italian, may have been wearing a grey button down shirt / uniform. John Doe Corrections Officer #1 put me in a headlock, and who put his knees on my head and my neck after I was taken to the ground.
2. **John Doe Corrections Officer #2:** Male corrections officer who was approximately 5'11", had a medium build, and may have been a light skinned African American wearing a grey button down shirt / uniform. John Doe Corrections Officer #2 had his knee on my chest after I was taken to the ground.
3. **John Doe Corrections Officer #3:** Male corrections officer who held my feet when I was taken to the ground. I could not see John Doe Corrections Officer #3 well because he was holding my feet.
4. **John Doe Corrections Officer #4:** Male corrections officer who was shorter than 5'11", had a medium build, and was Asian. He may have been wearing a grey button down shirt / uniform. John Doe Corrections Officer #4 put my right hand in handcuffs when I was taken to the ground.
5. **John Doe Corrections Officer #5:** Male corrections officer who is of unknown height, had a medium build, and was African American. He was approximately 240 lbs, and may have been wearing a grey button down shirt / uniform. John Doe Corrections Officer #5 was kicking my stomach when I was taken to the ground.

Please note that although I have listed John Does #1-#5 as corrections officers, due to the change of custody that happens during arraignments that happened to me on January 14, 2016, John Does #1 - #5 may be court officers or police officers.

Date: January 14, 2016 – approximately January 21, 2016

Location: Manhattan Detention Complex

Individuals:

6. **John Doe Corrections Officer #6:** Male corrections officer who is of unknown height, was under 5' 11", and was African American. John Doe Corrections Officer #7 was stationed outside the holding pen where I was being kept. I told this corrections officer that I was throwing up blood and showed him the blood I had thrown up and he did nothing.
7. **John Doe Corrections Officer #7:** Male corrections officer who was a captain. He was African American, had a medium build, and wore glasses. John Doe Corrections Officer #8 came to my holding cell, and may have been a supervisor for John Doe Corrections Officer #7. I told this corrections officer that I was throwing up blood, he noted that I was throwing up blood, but did nothing to help me.
8. **John Doe Corrections Officer #8:** Male corrections officer who is of unknown height, was under 5' 11", and was African American. John Doe Corrections Officer #8 was stationed outside the holding pen where I was being kept. I told this corrections officer that I was throwing up blood and showed him the blood I had thrown up and he did nothing.

Date: Approximately January 21, 2016 to January 27, 2016

Location: Riker's Island

Individuals:

9. **John Doe Doctor #9.** Male doctor who refused to treat me at infirmary I went to on Riker's Island. John Doe Doctor #9 had dark skin and may have been African or Jamaica. When I showed my injuries to John Doe Doctor #9, he told me he would not treat me.

Please let me know if you have any questions, or need any other information.

Respectfully,



Scott Hill  
298 Nome Ave.  
1st Floor  
Staten Island, NY 10314  
718/568-8805